



United States Department of the Interior

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IN REPLY REFER TO:

ER 98/0464

September 4, 1998

John E. Medema
AMWTP EIS Document Manager
Department of Energy, Idaho Operations Office
850 Energy Drive, MS 1117
Idaho Falls, Idaho 83403

Dear Mr. Medema:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Advanced Mixed Waste Treatment Project (Project), Idaho National Engineering and Environmental Laboratory, Department of Energy (DOE) Bonneville County, Idaho. The following comments are provided for your information and use when preparing the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

The DEIS correctly states the magnitude of the impacts from the proposed Project's emissions to the Craters of the Moon National Monument (Monument). The Monument, managed by the National Park Service (NPS), is a Federal mandatory Class I area. The air quality analysis presented in the DEIS applies the Environmental Protection Agency's Industrial Source Complex Short Term and uses two years of on-site meteorological data to calculate the impacts from normal operations of the proposed Project. The air quality analysis indicates emissions from the proposed Project would not exceed the National Ambient Air Quality Standards or the Prevention of Significant Deterioration (PSD) Class I increments. The DEIS also includes a cumulative PSD Class I increment analysis. This analysis, which includes all increment consuming sources at the Idaho National Engineering and Environmental Laboratory facility and other increment consuming sources in the area, indicates that the increments are not exceeded at the Monument.

The Department recommends the FEIS provide information which appears to have been omitted in the DEIS. In Section E-3 Air Resources, the DEIS refers to performing a coherent visible plume analysis using the EPA VISCREEN model to assess visibility impacts to the Monument. The FEIS should include the methodology and results of the visibility analysis. The FEIS should also reference the 1995 "DOE Programmatic Spent Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement," which address accident release scenarios.

Questions regarding the preceding comments should be referred to Mr. John Notar of the NPS' Air Resources Division in Denver, Colorado at (303) 969-2079. We thank you for the opportunity to comment.

Sincerely,

Preston Sleeper
Regional Environmental Officer